

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION**

RICHARD HALL,
on behalf of Plaintiff and the class members
described below,

Court File No. 1:24-cv-01385-JPH-KMB

Plaintiff,

v.

EAST LINE LENDING, LLC; CRYSTAL
CHAPMAN-CHEVALIER; WOLF RIVER
DEVELOPMENT COMPANY; NEW
PLATFORM FUND, LLC; and JOHN DOES
1-20,

Defendants.

**DEFENDANT EAST LINE LENDING, LLC'S CORPORATE DISCLOSURE
STATEMENT PURSUANT TO FEDERAL RULES OF CIVIL PROCEDURE 7.1**

COMES NOW Defendant East Line Lending, LLC, in the above-captioned civil action,
and pursuant to Fed. R. Civ. P. 7.1,¹ makes the following disclosure:

1. Is the party a publicly held corporation or other publicly held entity?

No.

2. Does the party have any parent or subsidiary corporations?

Defendant East Line Lending, LLC is a tribal limited liability company created under
the laws and ordinances of the Menominee Indian Tribe of Wisconsin ("Tribe"), a

¹ Defendant East Line Lending, LLC files this disclosure statement out of an abundance of caution. Pursuant to Fed. R. Civ. P. 7.1 only a "nongovernmental corporate party" is required to file a corporate disclosure statement. By filing this disclosure statement, East Line Lending, LLC is in no way asserting that it is a "nongovernmental corporate party," as East Line Lending, LLC is a corporate entity wholly owned by a federally-recognized Indian Tribe. As such, Defendant East Line Lending, LLC may be deemed a governmental corporate party. *See Coughlin v. Lac du Flambeau Band of Lake Superior Chippewa Indians*, 143 S. Ct. 1689 (2023) (finding that tribal corporations wholly-owned and operated by federally-recognized Indian tribes are deemed "governmental units," under the bankruptcy code.). Further, nothing in this disclosure statement, including the filing hereof, should be deemed as an expressed or implied waiver of its tribal sovereign immunity, all of which is expressly preserved.

federally-recognized Indian tribe pursuant to 87 Fed. Reg. 4636 (Jan. 28, 2022) and, The Menominee Restoration Act of 1973, 15 U.S.C. §§ 903 et seq. East Line Lending, LLC is a wholly-owned subsidiary of Four Directions Lending, LLC. Four Directions Lending, LLC is a tribal limited liability company created under the laws and ordinances of the Tribe. Four Directions Lending, LLC and its subsidiaries including East Line Lending, LLC, were created with the purpose of stimulating economic growth and jobs for tribal members by engaging in tribal consumer lending.

3. Is 10% or more of the stock of the party owned by a publicly held corporation or other publicly held entity?

No.

Dated: October 14, 2024

SPENCER FANE, LLP

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